

IN THE UNITED STATES DISTRICT COURT
EASTERN STATE OF WISCONSIN

REBECCA TERRY,

Plaintiff,

vs.

Case No. 17-CV-01112

COUNTY OF MILWAUKEE, et al.,

Defendants.

Deposition of

BRIDGETTE GREEN

Friday, August 3, 2018

1:08 p.m.

at

Leib Knott Gaynor LLC
219 North Milwaukee Street
Milwaukee, Wisconsin

Reported by Faye M. Talatzko, RPR

1 lot of it.

2 Q What does SMT stand for?

3 A Special Management Training.

4 Q And what weapons training did you receive?

5 A To become Wisconsin certified to be able to carry a

6 firearm.

7 Q In the course of your training to be a correctional

8 officer, have you received any training about

9 responding to inmate medical needs?

10 A Well, if you want -- Yes, yes.

11 Q Okay. What did that consist of?

12 A Well, we do it all the time. Sometimes we might have

13 scenarios at the academy. It just all depends. And

14 that's part of the qualification.

15 Q Okay. So like teaching scenarios about medical

16 issues?

17 A Um-hum.

18 Q What were you trained to do in response to medical

19 issues?

20 A It all depends on when I get there, who is all there

21 when I get there, if I'm in like a housing unit. It

22 just all depends.

23 Q Were you given any specialized training on how to

24 work in the special medical unit?

25 A No. It is like a regular unit.

1 Q Okay. And did you ever receive any training related
2 to pregnant inmates?

3 A No.

4 Q You are familiar with Armor Correctional, right?

5 A Yes.

6 Q Have you ever received any training of any kind
7 through Armor?

8 MS. KUGLER: Object to form.

9 MR. ARNOLD: Also as to foundation.

10 MS. KLEINHAUS: Go ahead.

11 MR. ARNOLD: If you know.

12 A I'm not sure if it was Armor, but they did a couple
13 of in-services regarding SMT training. I can't
14 remember what else.

15 BY MS. KLEINHAUS:

16 Q Okay. So is it fair to say you don't know whether
17 Armor has provided you any training?

18 A I know that they have; I'm just not exactly sure
19 which one.

20 Q Okay.

21 A I know SMT training and suicidal inmates, and that's
22 about it.

23 Q You said SMT is Special Management Training?

24 A Yeah.

25 Q What do they cover in that training?

1 A Basically, mentally ill inmates.

2 Q So the training that was provided to you by Armor was

3 the SMT and the suicidal inmate training?

4 A Yes.

5 Q Anything else?

6 A No, not that I can remember.

7 Q Are you familiar with my client Rebecca Terry?

8 A Her personally? Like her name? No.

9 Q Okay. I'm going to talk to you about an incident

10 from March 9 and 10 of 2014. Do you recall

11 encountering Ms. Terry at that time?

12 A She is the one that had the baby in the jail?

13 Q Yes, ma'am.

14 A Yes.

15 Q Okay. And is that from your own memory, that you are

16 able to remember that yourself, or is it based on

17 documents that you believe you were there?

18 A I just remember parts of the incident. She is the

19 only person I can remember having a baby -- a live

20 baby in jail.

21 Q And when did you first encounter her on March 9 or

22 10?

23 A It was in the back of the ambulance.

24 Q So at that point she had already had the baby?

25 A Yes, there was a baby.